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Clerk
District Court

AUG 26 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

XIANG HUA LI,) CIVIL ACTION NO. 05-0016
)
Plaintiff,)
)
vs.) PLAINTIFF'S INITIAL DISCLOSURE
)
NEO FASHION INC., MS. CHEN and)
JANE DOE,)
Defendants)
)
)
)
)

DATE: SEP 07 2005

TIME: 8:15 AM

Pursuant to Fed. R. Civ.P. 26(a)(1) and L.R. 16.2CJ.d,
Plaintiff hereby makes her initial disclosures:

I.

Individuals Likely to Have Discoverable Information

Pursuant to Rule 26(a)(1)(A), Plaintiff provides the
following list of persons likely to have discoverable
information that will support Plaintiff's allegations.

1. Rah Byung Moon (Neo Fashion, P.O. Box 1718, San Antonio

ORIGINAL

1 Saipan, MP 96950; Tel: 234 9642. This person is leaving Saipan
2 on September 9, 2005.

3 2. Chen Fu Min (Ms. Chen?)

4 3. Shun Ying Liu

5 4. Hui Juan Wu

6 5. Jin Bao Wang

7 6. Yu Bao Zhao

8 7. Hjoong Lau Gu

9 8. Plaintiff's Line Leader at Neo Fashion (Name unknown at
10 present)

11 Addresses will be furnished as soon as available.

12 II.

13 **Documents and Tangible Things**

14 Pursuant to Rule 26(a)(1)(B) the following Documents and
15 Tangible Things that are, or will be in possession of
16 Plaintiff either originally or pursuant to discovery are as
17 follows:

18 1. Plaintiff's personnel file

19 2. Personnel file of Li Xue Jiao.

20 3. Personnel files of above named in I, 2-8, above.

21 4. Company Handbook


22 5. Plaintiff's Labor Contract

III.

Computation of Damages

Pursuant to Rule 26(a)(1)(C), Plaintiff would seek, should this matter go to trial, back pay, compensatory damages, punitive damages, front pay, and attorney fees. The parties are presently negotiating a settlement and it is anticipated that such settlement shall be concluded prior to the September 7, 2005, Case Management Conference presently scheduled.

Respectfully submitted on this 26th day of August 2005.


Loren A. Sutton
Counsel for Plaintiff
Bar No. Fol79